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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	Case No. 2:14-cr-00138-JAD-VCF
Plaintiff,	)	
	)	
vs.	)	
	)	
CHARLES RAY BELL, JR.,	)	
	)	
Defendant.	)	

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**STIPULATION FOR EXTENSION OF TIME**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bodgen, United States of Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Russell E. Marsh, Esquire, Wright Stanish & Winckler, counsel for Defendant, that the date for the Defendant to file his reply in support of his Motion for Production of Additional Police Reports (Docket #35) be extended for one (1) week, until April 6, 2015.

This stipulation is entered for the following reasons:

1. On December 1, 2014, the Defendant, through prior counsel, filed a Motion for Production of Additional Police Reports (the "Motion"). *See* Docket #35. The parties filed several stipulations to extend the time for the government to respond to the Motion.

2. The Government filed its response on March 23, 2015 (Docket #53). Under the Court's previous Order, the Government's response was due on March 30, 2015, and the Defendant's reply if any, was due seven (7) days after the filing of the Government's Response. *See* Order dated March 11, 2015 (Docket #52). Thus, Defendant's reply brief is due on March 30, 2015.

3. Defendant Bell requests an additional week to prepare his reply brief. This will not add any time to that contemplated by the latest scheduling order on this motion.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the Defendant adequate time to prepare a response. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. This is the first stipulation filed herein to continue the Defendant's reply deadline.

Dated: March 30, 2015.

DANIEL G. BOGDEN  
UNITED STATES ATTORNEY

WRIGHT STANISH & WINCKLER

BY /s/ Phillip N. Smith, Jr.  
PHILLIP N. SMITH, JR.  
Assistant United States Attorney  
333 Las Vegas Boulevard South  
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Las Vegas, NV 89101

BY /s/ Russell E. Marsh  
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**ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for Defendant Bell to file any reply on his Motion for Production of Additional Police Reports (Docket #35) is extended until April 6, 2015.

DATED this 31st day of March, 2015.



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CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE